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August 6, 1999

U.S. Department of Transportation Dockets
Docket No. FAA-19993924
400 Seventh Street, SW
Room Plaza 401
Washington, DC 20590

In the matter of:
Docket No. FAA-1999-5924 - 4
SFAR 85-
Year 2000 Airport Safety Inspections

Dear Sir or Madam:

On behalf of the U.S. scheduled airline industry, the Air Transport Association of America and the Regional Airline Association hereby file the following comments on the subject Notice of Proposed Rulemaking (64 Fed.Reg. 37026, July 8, 1999).

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1. Subject to certain practical considerations discussed below, ATA supports the proposal to require airport operator certificate holders to verify the *functionality* of certain systems immediately after the rollover from 1999 to the Year 2000. This exercise will help maintain the safety and integrity of the National Air Transportation System. It is important to note, however, that these functionality checks are limited to checking iust the rollover from 1999 to 2000. A test of functionality shortly after midnight, January 1, 2000 does not guarantee longer-term functionality. Proper Y2K functionality checking requires looking at not only January 1, 2000 but also February 29, 2000, and possibly other dates. We recommend that the FAA clarify this point by designating; the proposed testing as "Year 2000 functionality checks."

2. As a practical matter, functionality testing should not create the very problems the FAA and we wish to avoid. In finalizing this rule, FAA should be mindful of the guiding principle to first "do no harm." For example, if an airport's runway lights are properly illuminated at one-minute to midnight, and the lights do not fail as a result of the date rollover, then functionality has been established and a check of the lighting system should be delayed until the system cycles off at first light. Otherwise, a check just after midnight that fails could unnecessarily cause the airport to close. FAA should determine which systems need to be checked immediately after midnight, and which systems – such as lights – can be checked at a later time.

3. Most airlines and many airports are "24 by 7" operations, with flights taking off and departing around the clock Subject to the practical consideration noted above, it is imperative that all airports be required to complete the functionality checks within two hours of local midnight, irrespective of activity levels or time of first flight. On the other hand, there should be no requirement, and airports should not be permitted, to close in order to conduct the required functionality checks. Neither the nature nor the extent of this exercise necessitates an airport closure, and FAA should clarify this point. In addition, while we agree that functionality checks should occur following midnight *local* time, there may be systems in place that operate on Universal Time Coordinated (UTC). For example, midnight UTC on December 3 1 will occur at 7:00 p.m. on the East Coast. Consequently, FAA should require airports to identify systems operating on UTC time, conduct functionality checks of those systems following UTC midnight, and report on those systems within the same time frame (i.e., complete checks within two hours, report within three) set forth in the NPRM.

4. Regarding completion of the functionality tests, only if it can be established well before the end of the year that an airport is not scheduled to have any commercial service within the first 48 hours of the New Year should an airport be exempted from this "two hour" rule. In those cases, we recommend that the airport be required to complete and report on its functionality tests no less than 24 hours before the first scheduled commercial operation. We recommend that such airports be identified in a FAA-issued NOTAM or Advisory no later than December 15, 1999.

5. FAA should also consider requiring designated alternate airports to conduct these functionality checks. Reporting requirements should be the same for these airports as well.

6. We strongly support the one-hour reporting requirement. Such a reporting schedule will assist airlines, who rely on real time weather, traffic and system information, to determine individually if their scheduled operations need to be revised. Allowing airports to wait until one hour before the first flight overlooks the fact that aircraft may already be airborne (such as a "red-eye" flight from the west coast to the east coast), and therefore those airports would be reporting after the plane is in the air.

7. Also, in order to simplify the reporting structure, it is imperative that FAA require all airports to report on all of the systems that fall into the categories described in the SFAR. This would apply irrespective of whether the system in question has computer controlled operations systems. Allowing non-automated airports to "skip" items could cause considerable confusion since all interested persons may not know a particular airport is not automated. Making the report all-inclusive will avoid such problems. For an airport that has no computer-controlled systems, it could submit a

simple "all is well" report, which would signal to airlines and the FAA that the airport is fully functional.

8. In an effort to get the functionality check results disseminated as quickly and widely as possible, we recommend that the FAA take the following steps:

   (a) Local FAA facility managers should issue NOTAMs, Advisories or ATIS messages via normal mechanisms should any outages should occur. FAA should determine which entity should issue those reports: the Flight Service Station, local ATC tower, Airports District Office, or Regional Airports Division Managers.

   (b) During the rollover period, a coordination desk should be established at the Air Traffic Control System Command Center to coordinate the collection and dissemination of airport report information to airlines, airports and other users. This will enable FAA and others to monitor developments as they occur and to take appropriate actions as situations may dictate.

   (c) Advise airlines of airports reporting "all clear" via an appropriate advisory. An "all clear" advisory could be issued by Airport District Offices or Regional Airports Division managers on an hourly basis. Once an airport has been listed as "all clear," no additional reporting would be expected from that airport. We strongly urge that this "all clear" mechanism be developed so that all parties will know that any particular airport is open for service. No airport should be permitted to not report to the FAA. Absent such a report, airlines, FAA and other interested parties will not know if the airport has simply failed to report or if it is subject to power and/or telecommunications failures that render it unable to report.

9. With regard to the proposed requirement that airports test their Aircraft Rescue and Fire-fighting (ARFF) Equipment, airport operators have noted that the discharge of extinguishing agents in a functional test will result in the need to recharge the equipment, which then renders that equipment "out of service" for a period of time. As discussed earlier, the functionality checks required by FAA should not create problems that could and should be avoided. We recommend that FAA review the procedures for conducting ARFF equipment functionality checks so that the airport's ARFF index is not adversely affected. (One potential solution might be to perform the functionality checks on an incremental basis so as to not inadvertently lower an airport's ARFF index during the check/recharge period.) Also in this regard, it is important to recognize that some airports may have arrangements with local authorities for off-airport fire fighting equipment as a contingency plan. Off airport vehicles must also remain operational. Finally, for the reasons set forth in the NPRM, ATA supports the suspension of the 48-hour ARFF index replacement.

10. FAA should consider having airports that operate one or more systems on a back-up or contingency basis after the date rollover report that information with other functionality check information. Once normal operations are restored, those airports should report that new information to the FAA immediately.

11. At least one of the tests most airports will be required to complete involves communicating with FAA personnel in the Air Traffic Control Tower. We believe that FAA needs to assure the airport operators and airlines that those towers that operate on a less-than-full-time-basis will be manned during each airport's test window. This coordination needs to be mandated from FAA Headquarters but coordinated locally between the Tower Chief and the airport operator.

12. The proposed rule is unclear regarding the scope of communications systems that must be tested. We recommend that FAA clarify whether "airfield communications" as used in the NPRM includes: (a) all normal telephonic capabilities (i.e., airport to tower, airport to town, airport to outside entities, etc.); (b) all normal radio communications within the airport boundaries; (c) NOTAM and/or NADIN capabilities (if applicable); and/or (d) all normal non-verbal communications (i.e. computer-based, Internet, ARINC, etc.).

13. Finally, we urge FAA to publish the final rule as soon as possible, but not later than October 15, 1999. We also urge FAA to determine and publish by October 15, 1999 the final list of systems that need to be checked. We urge FAA to require airports to consult with the airlines and other tenants regarding their plans for the functionality checks required by the final rule, and to establish their final schedules no later than 30 days after publication of the final rule but in no event later than December 1, 1999. This schedule should provide adequate time for local coordination between the airport and its tenants.

Respectfully submitted,

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